

TO: Clerk's Office
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL

UNITED STATES

-v.-

MICHAEL CHKHIKVISHVILI,
also known as "Mishka," "Michael,"
"Commander Butcher" and "Butcher,"

24-MJ-306

Docket Number

SUBMITTED BY: Plaintiff ___ Defendant ___ DOJ ☒

Name: Andrew D. Reich

Firm Name: USAO EDNY

Address: 271-A Cadman Plaza East

Brooklyn NY 11201

Phone Number: 718-254-6452

E-Mail Address: andrew.reich@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES ___ NO ☒

If yes, state description of document to be entered on docket sheet:

MANDATORY CERTIFICATION OF SERVICE:

A.) ___ A copy of this application either has been or will be promptly served upon all parties to this action, B.) ___ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: ___; or C.) ☒ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

04/22/2024

DATE

A handwritten signature in black ink, appearing to read "Andrew Reich", written over a horizontal line.

SIGNATURE

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: _____

Judge/Magistrate Judge: _____

Date Entered: _____

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

Ongoing criminal investigation. _____

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

DATED: Brooklyn, NEW YORK
04/22/2024

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U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE 04/22/2024

DATE

CRH:EHS/ADR
F. #2023R00792

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

MICHAIL CHKHIKVISHVILI,
also known as “Mishka,”
“Michael,”
“Commander Butcher”
and “Butcher,”

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

ERICA DOBIN, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

SOLICITATION OF VIOLENT CRIMES

In or about and between July 2022 and March 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAIL CHKHIKVISHVILI, also known as “Mishka,” “Michael,” “Commander Butcher” and “Butcher,” did knowingly and intentionally solicit, command, induce and otherwise endeavor to persuade another person to engage in conduct constituting a felony that has as an element the use and attempted use of physical force against the person of another, in violation of the laws of the United States, to wit: transporting an explosive with

To Be Filed Under Seal

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN APPLICATION FOR
AN ARREST WARRANT

(18 U.S.C. § 373)

Case No. 24-MJ-306

intent to kill or injure, in violation of Title 18, United States Code, Section 844(d), with the intent that such other person engage in such conduct and under circumstances strongly corroborative of that intent.

(Title 18, United States Code, Sections 373 and 3551 et seq.)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2019. I am currently assigned to the FBI's New York Joint Terrorism Task Force ("JTTF"), where I am responsible for conducting investigations involving domestic and international terrorism, interstate threats, and other offenses. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, interviews with witnesses and victims, and reports of other law enforcement officers involved in the investigation. Where I describe the statements of others, I do so only in sum and substance and in part.

PROBABLE CAUSE

I. Maniac Murder Cult

2. Based on my training and experience and this investigation, I am aware that Maniac Murder Cult (also known as "Maniacs Murder Cult," "Maniacs: Cult of Killing," "MKY," "MMC" and "MKU") is a Russian- and Ukrainian-based racially or ethnically motivated violent extremist ("RMVE") group with members in the United States and around

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

the world. MKY adheres to a Neo-Nazi accelerationist ideology and promotes violence and violent acts against racial minorities, the Jewish community and other groups it deems “undesirables.” MKY members share a common goal of challenging social order and governments via terrorism and violent acts that promote fear and chaos.

3. MKY members and recruits have regularly communicated through an encrypted social media and mobile messaging electronic communication service (“ECS”) based outside the United States (hereinafter, “ECS-1”). ECS-1 advertises itself as a secure and untraceable communications platform. ECS-1 allows users to communicate one on one, in public or private group chats, and through “channels.” As defined by ECS-1, channels are a tool for broadcasting public messages to large audiences and can have an unlimited number of subscribers.

4. MKY channels have been used to share videos depicting and encouraging acts of violence on behalf of MKY, including what appear to be beatings, stabbings and other assaults. Posts in these channels have also specifically sought the recruitment of those with experience working with explosives and with biological and chemical weapons in order to engage in mass violence. Below are examples of the type of violent imagery posted in ECS-1 channels and chats associated with MKY:



5. Since in or about September 2021, an individual purporting to be a “recruiter,” “administrator” and “curator” for MKY (and later, its “leader”), who uses the alias “Commander Butcher,” among other aliases, has published various editions of a manifesto titled the “Hater’s Handbook,” which has been distributed on MKY ECS-1 channels and elsewhere. A third edition of the Haters Handbook was circulated in or about October 2023, purportedly authored by “Commander Butcher and the MMC Collective.” The Handbook discusses MKY’s principles and encourages members to engage in acts of violence in furtherance of those principles. Chapter titles include “Weapons of Anarchy” and “White Race One Race.” The introduction to the third edition of the Hater’s Handbook states in part:

I’m Commander Butcher National-Socialist since birth and curator of MMC also known as Maniacs Murder Cult I can proudly say I’ve murdered for white race and willing to bring more of chaos in this rotten world. This book is for readers who are cruel warriors or are willing to become one and are ready to step on massive actions Our main goal is to spread flames of Lucifer and continue his mission of ethnic cleansing, great drive of purification.²

² Spelling and grammatical errors in quoted material throughout this Complaint are reproduced without alteration.

6. Based on my training and experience and the investigation to date, I know that members of RMVE groups like MKY use the phrase “actions” to mean violent acts in furtherance of the groups’ ideologies. Among other things, the Hater’s Handbook encourages its readers to commit school shootings and to use children to perpetrate suicide bombings and other mass killings targeting racial minorities. The document describes methods and strategies for committing mass “terror attacks,” including, for example, using vehicles to target “large outdoor festivals, conventions, celebrations and parades” and “pedestrian congested streets.” It also specifically encourages committing attacks within the United States.

7. The Hater’s Handbook lists contact information for its author, including the email address “commanderbutcher@protonmail.com,” the username “@CommanderButcher” for communicating on an encrypted ECS (“ECS-2”) similar to the one described above, and the username “BUTCHER88”³ for communicating on a third encrypted ECS (“ECS-3”).

8. FBI and JTTF personnel have identified “Commander Butcher” as the defendant MICHAEL CHKHIKVISHVILI (hereinafter, “CHKHIKVISHVILI”). CHKHIKVISHVILI is a 20-year-old Georgian national and active MKY member who has previously spent time in the United States.

9. In a series of voluntary interviews conducted in 2023 and 2024, an individual whose identity is known to your affiant (“Individual-1”) told JTTF agents, in sum

³ Based on my training and experience, I know that “88” is a phrase used by white supremacists as a stand-in for “Heil Hitler” (H being the 8th letter of the alphabet).

and substance and in part, that the author of the Hater's Handbook was Individual-1's ex-boyfriend "Mishka," whom Individual-1 met on ECS-1.⁴ Individual-1 communicated with "Mishka" at T-Mobile phone number 347-909-9651 (the "Subject Phone Number"), among other numbers. The Subject Phone Number was subscribed to CHKHIKVISHVILI in his name.

10. Individual-1 stated that "Mishka" visited her in California and stayed with her from approximately March through April 2022. According to information obtained from law enforcement databases, CHKHIKVISHVILI travelled to the United States from March through April 2022 and provided Individual-1's home address as his address of record in the United States to border authorities. A screenshot found on Individual-1's phone contains details for a travel booking from the United States to Georgia in April 2022 in CHKHIKVISHVILI's name.

11. Individual-1 further stated that sometime after April 2022, "Mishka" traveled to Brooklyn, New York and stayed with his grandmother while he was there. According to information obtained from law enforcement databases, CHKHIKVISHVILI traveled to the United States again in June 2022 and provided his paternal grandmother's address in Brooklyn as his address of record in the United States to border authorities. Individual-1's information has been corroborated in several additional ways, as further described below.

⁴ Individual-1 was first approached by JTTF agents after social media posts she made, which referenced Neo-Nazi ideologies, were brought to the FBI's attention. Individual-1 was advised of her Miranda rights and consented to a non-custodial voluntary interview.

II. Solicitation of Violent Crimes

12. Beginning at least as early as July 2022, CHKHIKVISHVILI has encouraged others, via communications on ECS-1 and ECS-2, to commit acts of violence on behalf of MKY. This conduct included soliciting acts of mass violence in New York from an individual who claimed to be a prospective MKY recruit, but unbeknownst to CHKHIKVISHVILI was actually an undercover FBI employee (“UC-1”). In particular, CHKHIKVISHVILI solicited UC-1 to commit violent crimes, such as bombings, arson, and even poisoning children, for the purpose of harming racial minorities, Jews and homeless individuals. CHKHIKVISHVILI provided materials, such as bomb-making instructions, to facilitate his desire for UC-1 to carry out these violent crimes. CHKHIKVISHVILI has also made violent threats on a popular social media platform (“Platform-1”), including threats to kill Individual-1.

A. CHKHIKVISHVILI’s Relationship with Leader of Like-Minded RMVE Group

13. In or about and between July 2022 and March 2023, CHKHIKVISHVILI engaged in communications over ECS-1 with an individual whose identity is known to your affiant (“RMVE Leader-1”) who at the time was the leader of an international RMVE group called Feuerkrieg Division (“FKD”). Like MKY, FKD adhered to a Neo-Nazi ideology and targeted racial minorities, the Jewish community, the LGBTQ community and journalists. In or about September 2023, RMVE Leader-1 pled guilty to

federal charges for making death threats against a Brooklyn-based journalist in response to the journalist's investigation of racially motivated violent extremists.

14. CHKHIKVISHVILI communicated with RMVE Leader-1 about committing acts of violence against Jewish victims and others on behalf of MKY in the United States. For example, on or about July 19, 2022, CHKHIKVISHVILI stated, "Mky is only group so far that done so many kills." On or about August 26, 2022, CHKHIKVISHVILI stated, "Mky members preparing actions soon." Before that, on or about July 3, 2022, CHKHIKVISHVILI messaged RMVE Leader-1, "Is there anyway to get unmarked guns here [i.e., in the United States]?" and "Besides killing we should rob victims too."

15. CHKHIKVISHVILI also bragged to RMVE Leader-1 that he harmed and attempted to kill a Jewish victim in Brooklyn, New York. Specifically, on or about July 11, 2022, CHKHIKVISHVILI messaged RMVE Leader-1, "I'm working in rehab center privately in Jewish family // I get paid to torture dying jew // I think I almost killed him today actually // If he dies soon that's killstrike on me." CHKHIKVISHVILI sent RMVE Leader-1 multiple images of his purported client in a hospital bed and bragged about harming the victim.

16. Evidence gathered by the JTTF established that CHKHIKVISHVILI in fact worked at the Brooklyn-based rehabilitation facility referenced in his communications with RMVE Leader-1, and was employed by an Orthodox Jewish family to care for a family member. Specifically, CHKHIKVISHVILI worked for the family in July 2022 caring for a

now-deceased family member at the rehabilitation facility.⁵ Among other things, a member of the family positively identified the now-deceased family member in the photographs sent by CHKHIKVISHVILI to RMVE Leader-1, and further identified a photograph of CHKHIKVISHVILI shown to him by JTTF personnel as the individual the family had hired, stating that he believed the individual was from Georgia and that he went by the name “Michael,” which is an English iteration of MICHAIL. Additionally, the family members communicated with CHKHIKVISHVILI at the Subject Phone Number.

17. CHKHIKVISHVILI continued to communicate with RMVE Leader-1 about MKY and about additional violent acts until late March 2023, when RMVE Leader-1 was arrested. For example, on or about March 20, 2023 RMVE Leader-1 relayed a series of questions to CHKHIKVISHVILI over ECS-1 from an unknown individual seeking to join MKY and to learn its methods. Among other things, RMVE Leader-1 asked on behalf of the individual, “Is there any way in particular MKY avoided the footage of their ultraviolence challenge submissions being traced to them? I think the obvious starters would be of course VPNs and posting the content on encrypted sites from anon accounts.” CHKHIKVISHVILI responded, “You remove metadata from video first // Or from any file committing such crime as murder which will be investigated.” Based on my training, experience and knowledge of this investigation, I understand RMVE Leader-1’s reference to MKY’s “ultraviolence challenge submissions” to mean MKY’s practice of encouraging its recruits and members to film themselves committing acts of violence. I further understand

⁵ I understand that the family member had been sick for some time and died in or about August or September 2022. The government does not allege in this Complaint that CHKHIKVISHVILI was responsible for his death.

CHKHIKVISHVILI's statements to be his explanation for how MKY attempts to evade law enforcement detection of their conduct.

18. Subsequently, RMVE Leader-1 asked CHKHIKVISHVILI if he should put the individual directly in touch with CHKHIKVISHVILI so that they could discuss how the individual could join MKY. CHKHIKVISHVILI responded, "Just explain to them what membership in mky means and what actions should be recorded in good quality Beating, Arson, Killing // Beating brutal one not regular." I understand CHKHIKVISHVILI to be indicating that individuals wishing to join MKY must record and submit videos of themselves committing violent acts like brutal beatings, arson and murder.

19. CHKHIKVISHVILI communicated with RMVE Leader-1 from several separate ECS-1 accounts, including one with display name "SADISTIC LECHER," username "@sadisticlecher" and user ID 5289514373 ("ECS-1 Account-1"), and one with display name "FLESHER," username "@analeverlastedfuck" and user ID 6272812138 ("ECS-1 Account-2").⁶

⁶ Multiple sources of evidence support that ECS-1 Account-1 was used by CHKHIKVISHVILI. Among other things, the user of that account stated that he was from Georgia and that he was visiting New York where his "granny" lived. Moreover, on a separate chat thread, RMVE Leader-1 introduced the user of ECS-1 Account-1 to others as "the legendary Georgian maniak [i.e., MKY member] that wrote Haters Handbook." Multiple sources of evidence confirm that ECS-1 Account-2 was also used by CHKHIKVISHVILI. Among other things, the user of that account introduced himself to RMVE Leader-1 as "Commander Butcher" and referenced Georgia multiple times. CHKHIKVISHVILI has used that same alias in connection with other accounts. For example, CHKHIKVISHVILI opened an account at the cryptocurrency exchange Coinbase using his real name, date of birth and Georgian address, with the username "Commander Butcher," and regularly accessed the account from Georgia-based IP addresses.

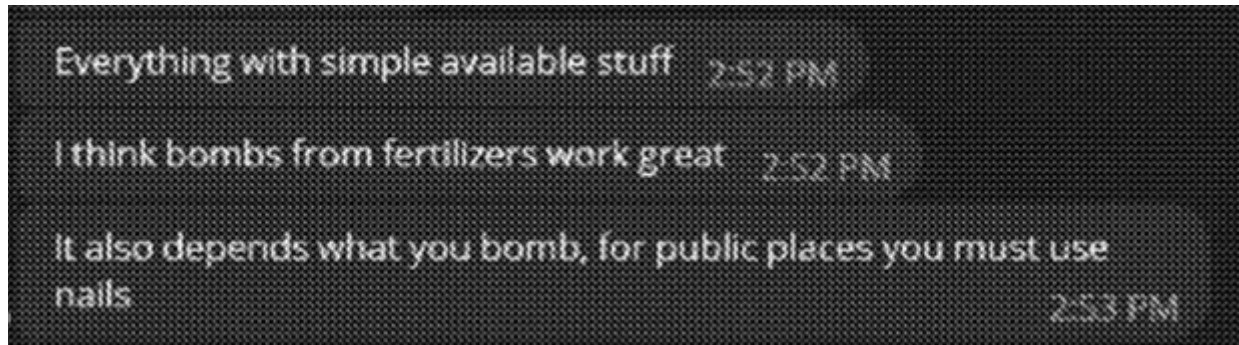
B. Communications with Undercover Agent Soliciting Acts of Mass Violence Against Racial Minorities, Jews and the Homeless

20. From in or about September 2023 to the present, CHKHIKVISHVILI has been communicating on ECS-1 and ECS-2 with UC-1, an undercover FBI employee posing as a prospective MKY member. During the course of these communications, CHKHIKVISHVILI has made detailed and specific overtures to UC-1 to commit acts of mass violence—in particular, murders of racial minorities, Jews and homeless individuals in New York City—on behalf of MKY, including bombings, arson and the spreading of poisons such as ricin.

21. For example, on or about September 8, 2023, CHKHIKVISHVILI messaged UC-1 about recruiting “maniacs” to join MKY and told UC-1 that he was in the process of writing the third edition of the Hater’s Handbook, which would address “direct actions.” CHKHIKVISHVILI stated, “I see USA as big potential because accessibility to firearms and other resources.” CHKHIKVISHVILI sent UC-1 links to violent videos that he described as “murder vids” and directed UC-1 to an ECS-1 channel where he could view additional videos of “hardcore actions” such as “videos of mky beheading and blowing up busses.” The channel contained videos depicting assaults and other acts of graphic violence.

22. In the same conversation, UC-1 asked CHKHIKVISHVILI whether there was an application process to join MKY. CHKHIKVISHVILI responded, “Well yes we ask people for brutal beating, arson/explosion or murder vids on camera.” He stated that “[p]oisoning and arson are best options for murder,” and suggested also considering a larger “massmurder[]” within the United States. CHKHIKVISHVILI advised UC-1 that the victims of these acts should be “low race targets.”

23. Later that month, CHKHIKVISHVILI began to provide more specific instructions to UC-1 for committing a violent attack. On or about September 29, 2023, UC-1 asked CHKHIKVISHVILI what kind of “action” he should take to join MKY. CHKHIKVISHVILI suggested making a homemade explosive device. He provided guidance as depicted below:



24. CHKHIKVISHVILI further told UC-1, “We have to choose our target first,” and later followed up asking, “So who are we targeting?” CHKHIKVISHVILI sent UC-1 files titled “MMC – COLD WEAPON” and “MMC – MANHUNT INSTRUCTION” and stated, “I want you to read those.” The “Cold Weapon” document described how to attack and kill victims using knives, hammers, screwdrivers and other weapons. The “Manhunt Instruction” document described how to avoid detection by law enforcement after attacking and killing victims, for example by changing clothes and hiding weapons.

25. CHKHIKVISHVILI also sent UC-1 several detailed manuals on building explosive devices. For example, he sent UC-1 a file called “Detonator,” which was a Russian-language bombmaking manual. The document provided a step-by-step guide on creating the various components of an explosive device, including the types and amounts of chemicals needed and how to mix them. CHKHIKVISHVILI advised that “murdering anyone in USA supports mky tbh // Big opportunity.”

26. The same day, on or about September 29, 2023, CHKHIKVISHVILI sent UC-1 a Russian-language document containing detailed instructions for committing acts of arson. CHKHIKVISHVILI stated, “This is very good arson guide it’s on Russian // Just translate pdf.” CHKHIKVISHVILI told UC-1, “When you finish reading all pdf-s we will on targets // You can even arson with no trace even nyc.” UC-1 indicated that he would travel from Pennsylvania to New York City to execute the attack. CHKHIKVISHVILI instructed UC-1 to target places and materials that would burn well and sustain damage, and further suggested targeting “homeless people” because the government would not care “[e]ven if they die.”

27. CHKHIKVISHVILI thereafter provided additional instructions to UC-1 for creating explosive devices. For example, on or about September 29, 2023, he wrote, “For simple Molotov you just need 1/3 car engine oil 2/3 petrol,” “There’s also one recipe worth of trying // With fertilizer and petrol,” and “You must mix fertilizer and petrol and let it stay on sun for 12 hours, after that it’s ready // Its like flammable bomb.” I understand “Molotov” to be a reference to a “Molotov cocktail,” the name commonly given to incendiary or explosive devices built from common materials.

28. As described above, the purpose of CHKHIKVISHVILI’s communications was to solicit violence and acts of murder on behalf of MKY. On or about October 17, 2023 CHKHIKVISHVILI told UC-1, “Just gotta make sure many people gonna die really by our hands.” CHKHIKVISHVILI instructed UC-1 to “[t]ry to record video” or else it would be a “lost action.”

29. CHKHIKVISHVILI also repeatedly emphasized MKY members’ readiness to commit actual acts of violence rather than merely discussing them. For

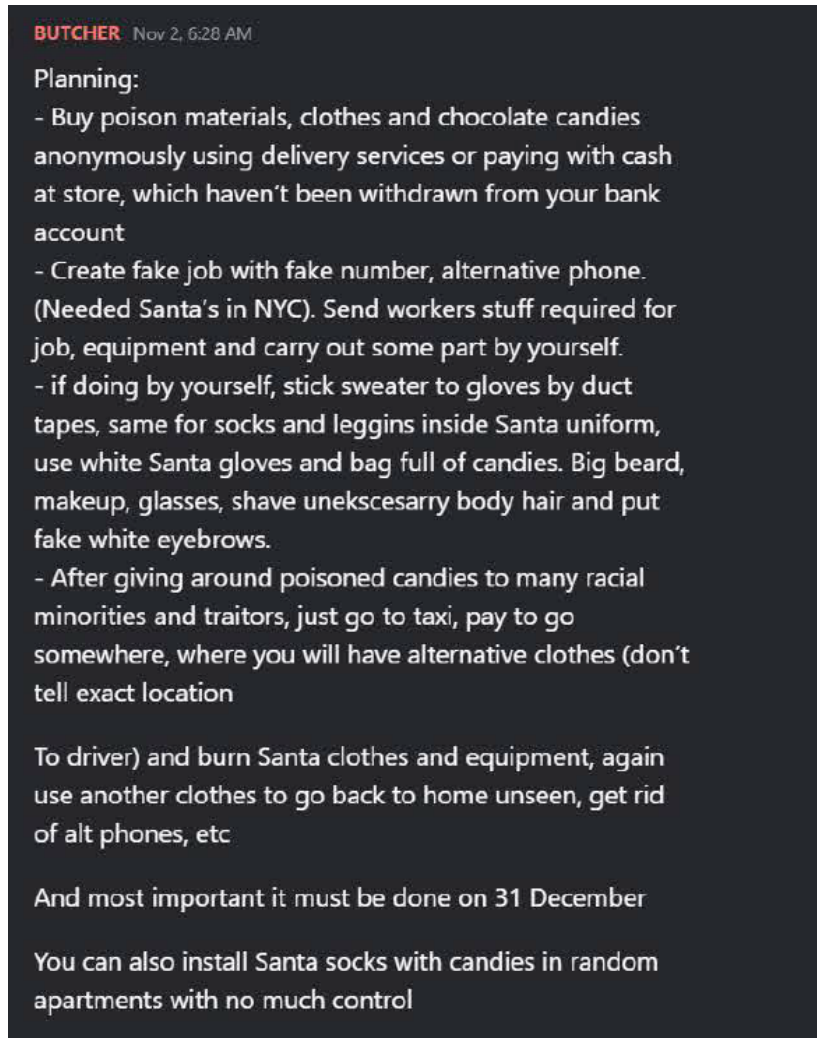
example, comparing MKY to another group, CHKHIKVISHVILI bragged that “We murder they larp.” I believe that “larp” is a reference to “Live Action Role Playing” games, in which individuals dress in costume and portray fictional characters. CHKHIKVISHVILI later praised individuals who “killed” as compared to individuals who did not and were therefore “fags,” a derogatory slur for gay men. CHKHIKVISHVILI also made repeated complimentary references to Islamic jihad—the violent and radical ideology followed by members and supporters of foreign terrorist organizations like ISIS and al Qaeda—and commented that he would “blow up myself with pleasure.”

30. On or about October 17, 2023, CHKHIKVISHVILI instructed UC-1 to download ECS-2 and ECS-3 because ECS-1 was not “safe” (I assess this to mean that law enforcement could access ECS-1). CHKHIKVISHVILI sent UC-1 his usernames for those platforms. On or about October 30, 2023, CHKHIKVISHVILI sent UC-1 a PDF copy of the Hater’s Handbook.

31. Soon thereafter, CHKHIKVISHVILI began communicating with UC-1 on ECS-2 about the schemes they had previously discussed. On or about October 31, 2023, UC-1 told CHKHIKVISHVILI that he had made and tested Molotov cocktails and was having trouble using them. CHKHIKVISHVILI responded, “Sometimes don’t explode right?”

32. CHKHIKVISHVILI also devised another violent scheme and provided UC-1 with detailed instructions on carrying it out. On or about November 2, 2023, CHKHIKVISHVILI told UC-1 that he could “do bigger action than Breivik without getting caught.” I understand “Breivik” to be a reference to Anders Behring Breivik, a Norwegian Neo-Nazi who killed 77 people in a bombing and mass shooting in Norway in 2011.

33. In particular, CHKHIKVISHVILI devised a scheme to murder racial minorities and others in New York City on New Year's Eve by dressing up as Santa Claus and handing out candy laced with poison. CHKHIKVISHVILI relayed step-by-step instructions on how UC-1 could successfully execute the scheme without getting caught, as depicted below:



34. CHKHIKVISHVILI sent UC-1 a lengthy document titled "The Mujahideen Poisons Handbook" and instructed him that "ricin would be most simple." The document contained detailed instructions on creating and mixing lethal poisons and gases to further the cause of "Islamic jihad." Based on my training and experience, I know that The

Mujahideen Poisons Handbook is a document linked to radical Islamist jihadist groups and designated foreign terrorist organizations such as the Islamic State of Iraq and Syria (“ISIS”). CHKHIKVISHVILI instructed UC-1 on the methods of making ricin-based poison in powder and liquid form, including by extracting ricin from castor beans.

35. The scheme was intended to cause violence in furtherance of MKY’s ideology. CHKHIKVISHVILI stated to UC-1, “Once you do poison attack, I’ll do message against US government.” On or about November 17, 2023, UC-1 told CHKHIKVISHVILI that he had obtained materials for extracting ricin and that the plan was on track.

36. On or about December 8, 2023, CHKHIKVISHVILI contacted UC-1 from a new account on ECS-1, stating, “It’s me Butcher / Don’t give this acc [i.e., account] to anyone.” CHKHIKVISHVILI pressed UC-1 for updates on the poison scheme and UC-1 responded that “your plan is in motion.” On or about December 19, 2023 CHKHIKVISHVILI messaged UC-1, “Anything new on castor?” I understand this to be a reference to extracting ricin poison from castor beans, further to the instructions previously sent by CHKHIKVISHVILI to UC-1, described above. UC-1 replied that he was in the process of testing the poison he had made. CHKHIKVISHVILI responded, “I’m glad process is going on” and asked UC-1, “Well how many human doses asides from test ones we got?” UC-1 responded that he had a small amount, and CHKHIKVISHVILI stated, “Well we’ve got no much time left brother” and that “New Year is coming.” CHKHIKVISHVILI asked UC-1 how he wanted to be credited in the “mky video” CHKHIKVISHVILI planned to post after a successful attack.

37. On or about December 28, 2023, CHKHIKVISHVILI asked UC-1 how the ricin tests were going, and discussed testing the ricin on small animals. He told UC-1

that the plan did not need to happen on New Year's Eve and that they could go forward with it in January if needed. On or about January 9, 2024, CHKHIKVISHVILI followed up again about the ricin and asked UC-1, "So when do you think you'll be able to test it on humans?" CHKHIKVISHVILI told UC-1 that they should execute the plan where there would be the "most people operating" and suggested targeting the "Jewish community." CHKHIKVISHVILI further noted that "Jews are literally everywhere" in Brooklyn and suggested executing the attack on "some Jewish holiday" and at "Jewish schools full of kids." He added, "Dead Jewish kids." CHKHIKVISHVILI further discussed publishing a video of the planned attack and bragged that "MMC will become bigger than Al Qaeda once it drops." UC-1 warned CHKHIKVISHVILI that the attack would "bring alot of heat on MKY tho [] // just as long as you are good with that." CHKHIKVISHVILI responded, "That's what we exactly want." On or about January 18, 2024, CHKHIKVISHVILI asked UC-1, "When should I expect news?"

38. CHKHIKVISHVILI communicated with UC-1 on ECS-1 from at least three separate accounts: (i) an account with display name "✖ BU+CHER ✖" and user ID 6272812138, which is the same account as ECS-1 Account-2 described above but with an updated display name;⁷ (ii) an account with display name "✖ BUTCHER ✖," username "@projectmurder88" and user ID 6558698292 ("ECS-1 Account-3"); and (iii) an account with display name "✖ БРАТСТВО КАИНА ✖" (among other display names at various times), username "@butcher141221" and user ID 6722229210 ("ECS-1 Account-4").

⁷ Display names on ECS-1 may be changed at any time and are not unique to the user. User ID's, on the other hand, cannot be changed and are unique to the user.

CHKHIKVISHVILI communicated with UC-1 on ECS-2 from an account with display name “BUTCHER” and username “@CommanderButcher” (“ECS-2 Account-1”).⁸

III. Violent Threats on Platform-1

39. CHKHIKVISHVILI has also made violent threats on Platform-1, a popular social media platform, including threats to kill Individual-1. According to information obtained from Platform-1, in or about October and November 2023, CHKHIKVISHVILI sent messages to multiple unknown users on Platform-1 from an account with username “human666grinder” in which he discussed committing acts of violence on behalf of MKY and relayed portions of the Haters Handbook. Below are several examples:

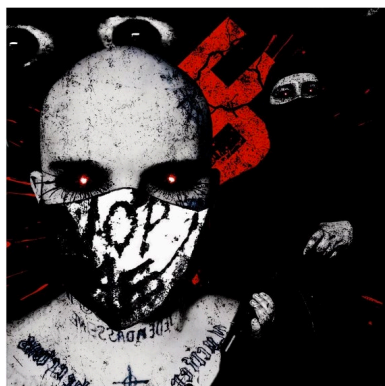
human666grinder (57964258886) - 10/30/2023 9:42:12am PDT: MKU/MMC is Maniacs Murder Cult created in Ukraine by Yegor Krasnov

human666grinder (57964258886) - 10/30/2023 9:42:32am PDT: It's terrorist organization carrying terror attack and murders

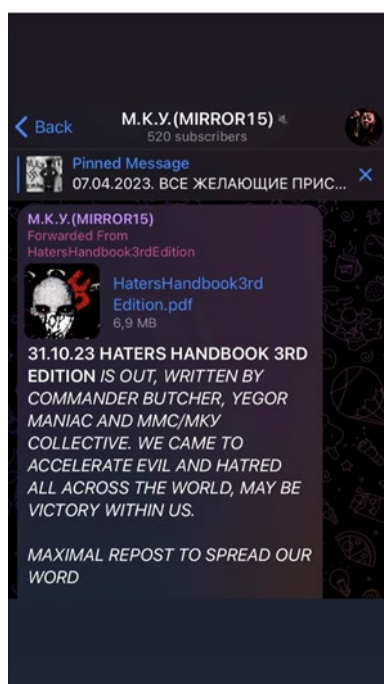
* * *

human666grinder (57964258886) - 2023/11/01 00:21 PDT:

⁸ Multiple sources of evidence support that these accounts were used by the same individual, and that that individual was CHKHIKVISHVILI. Among other things, each had CHKHIKVISHVILI's alias “Butcher” in the display name or username and each was used to conduct pieces of an ongoing conversation with UC-1 about MKY and committing acts of violence on behalf of MKY. As described above, the user of ECS-1 Account-2 introduced himself to RMVE Leader-1 as “Commander Butcher” and referenced Georgia multiple times. The user of ECS-1 Account-3 stated that he was the author of the Hater's Handbook and referenced his time in “NYC.” And ECS-2 Account-1 is the same account listed in the contact information for the author of the Hater's Handbook.



human666grinder (57964258886) - 2023/10/30 09:36 PDT:



human666grinder (57964258886) - 2023/10/26 00:53 PDT: Many falsehoods will come amongst our numbers, or will try to call themselves NS. There's no room for you unless you have truly done something and it's not going to gym or wiping off trash in nature, but only spilling blood of enemies, otherwise you are regular normie. We won't show mercy to anyone, everyone against our nihil ideas should be exterminated as well.



* * *

human666grinder (57964258886) - 10/06/2023 11:07:13am PDT: I fucking hate niggers

human666grinder (57964258886) - 10/06/2023 11:07:16am PDT: It's unreal

[REDACTED] - 10/06/2023 11:07:21am PDT: Me too

- 10/06/2023 11:07:23am PDT: And gas

- 10/06/2023 11:07:24am PDT: Gays

human666grinder (57964258886) - 10/06/2023 11:07:30am PDT: And Jews

human666grinder (57964258886) - 10/06/2023 11:07:35am PDT: And Asians

[REDACTED] - 10/06/2023 11:07:36am PDT: Preach

* * *

human666grinder (57964258886) - 10/06/2023 11:09:33am PDT: Have you heard of MKU/MMC

[REDACTED] - 10/06/2023 11:09:40am PDT: No

- 10/06/2023 11:09:42am PDT: What is it

human666grinder (57964258886) - 10/06/2023 11:09:55am PDT: It's maniacs murder cult created in 2017

human666grinder (57964258886) - 10/06/2023 11:10:15am PDT: Carrying over 50 murder and 150+ other actions

* * *

human666grinder (57964258886) - 10/08/2023 7:12:54am PDT: Keep looking on haters handbook 3rd edition

[REDACTED] - 10/08/2023 7:13:01am PDT: Idk what that is

human666grinder (57964258886) - 10/08/2023 7:13:08am PDT: Book

human666grinder (57964258886) - 10/08/2023 7:13:18am PDT: It will be published on Halloween

* * *

human666grinder (57964258886) - 10/08/2023 8:09:38am PDT: Glory to total rape and death of whores

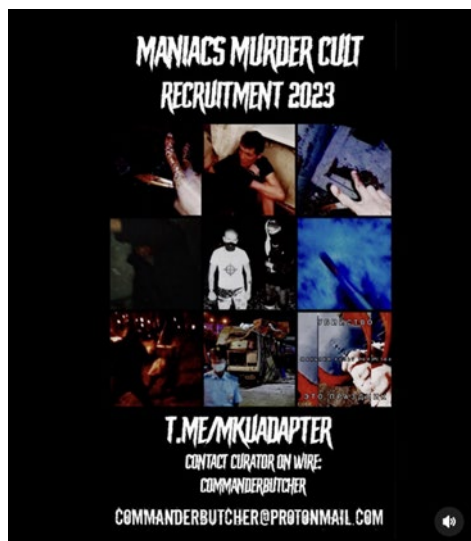
[REDACTED] - 10/08/2023 8:09:48am PDT: Amen

* * *

[REDACTED] - 10/30/2023 4:54:36am PDT: Stupid Jew fucks
human666grinder (57964258886) - 10/30/2023 4:55:27am PDT: They all will
be burned in one bloody pot

40. In additional conversations, CHKHIKVISHVILI stated that he was considering traveling to the United States, that it was a “good place for illegal grind,” and that he was “[g]onna poison half of nyc,” “bomb NYC,” and “kill everyone there.” CHKHIKVISHVILI bragged that he had “[k]illed a Jew,” that he was “glad I have murdered,” and that “I will murder more” but “make others murder first.” These conversations closely mirrored the topics discussed by CHKHIKVISHVILI with UC-1, described above.

41. CHKHIKVISHVILI also posted MKY recruitment materials from the “human666grinder” account on Platform-1, as depicted below:



42. Lastly, in a voluntary interview with JTTF agents, Individual-1 stated, in sum and substance and in part, that CHKHIKVISHVILI had contacted her in late 2023 via direct message on Platform-1 using the “human666grinder” account. Individual-1 stated that CHKHIKVISHVILI made threats toward her including that he wanted to kill her.

Individual-1 stated that CHKHIKVISHVILI boasted about having committed acts of violence such as rape, and that he told her that he wanted to destroy the United States government. Individual-1 captured screenshots of some of these messages and shared them with JTTF personnel.

WHEREFORE, your deponent respectfully requests that the defendant MICHAEL CHKHIKVISHVILI be dealt with according to law. Because public filing of this document could result in a risk of evasion by CHKHIKVISHVILI, as well as jeopardize the government's ongoing investigation, your deponent respectfully requests that this complaint, as well as any arrest warrant issued in connection with this complaint, be filed under seal.

/s/ Erica Dobin

ERICA DOBIN
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
22nd day of April, 2024

Robert Levy

THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

MICHAIL CHKHIKVISHVILI,
 also known as "Mishka,"
 "Michael,"
 "Commander Butcher"
 and "Butcher,"

Case No. 24-MJ-306

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) MICHAIL CHKHIKVISHVILI,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
☒ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

18 USC § 373 (solicitation of violent crimes)

Date: 04/22/2024*Robert Levy**Issuing officer's signature*City and state: Brooklyn, New YorkHon. Robert M. Levy, United States Magistrate Judge*Printed name and title*

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates *(name, relation, address, phone number)*: _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: _____

Date of last contact with pretrial services or probation officer *(if applicable)*: _____